## 1 DOUGLAS L. RAPPAPORT (CSBN 136194) Law Offices of Douglas L. Rapppaport 260 California Street, Suite 1002 2 San Francisco, CA 94111 415-989-7900 3 admin@sfcrimlaw.com 4 5 Attorney for Defendant ROOZBEH IRAVANI 6 7 UNITED STATES DISTRICT COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 SAN FRANCISCO DIVISION 10 11 UNITED STATES OF AMERICA, CR-17-0340-WHA 12 STIPULATION AND [PROPOSED] ORDER Plaintiff. CONTINUING STATUS CONFERENCE 13 AS MODIFIED V. **Current Hearing Date: December 5, 2017** 14 Time: 2:00 pm ROOZBEH IRAVANI Alsup 15 Judge: **January 23, 2017** 16 Defendants. **Proposed Hearing Date:** 2:00 pm Time: 17 18 The parties hereby agree and stipulate that the status conference date, currently set for 19 December 5, 2017, be continued until January 23, 2017 at 2:00 p.m. for a status conference before 20 The Honorable William Alsup. Mr. Iravani is out of custody on pre-trial release. 21 The charge in this case is possession of child pornography and is primarily based on a 22 computer forensic analysis of the Torrent Network and Mr. Iravani's hard drive. The government 23 has provided discovery in a timely fashion and the defense has been diligent in reviewing that 24 discovery. Given the complexity of the computer technology, the defense expert met with the 25 government expert on November 15, 2017. During this meeting, there was a computer problem that 26 required the rescheduling of both experts. This meeting is anticipated to occur within the next three 27 weeks, and then counsel will need additional time to evaluate the findings of this meeting with the 28

| 1  | expert and then negotiate a possible resolution or further litigation with government. Given counsel |  |  |
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| 2  | schedules and the holidays, both parties are requesting January 23, 2017 for a further statu         |  |  |
| 3  | conference.  |  |  |
| 4  | The parties agree that the ends of justice served by granting such an exclusion of time              |  |  |
| 5  | outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C.             |  |  |
| 6  | 6 3161(h)(7)(A). The parties agree to extend the time limits of                                      | 3161(h)(7)(A). The parties agree to extend the time limits of Rule 5.1 during this period as well. |  |
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| 8  | IT IS SO STIPULATED.   |  |  |
| 9  | Dated: November 29, 2017   | la!  |  |
| 10 | 10 DOUGLAS   | L. RAPPAPORT   |  |
| 11 | Attorney for ROOZBEH   | I IRAVANI  |  |
| 12 | 12   |  |  |
| 13 | BRIAN ST<br>United State   |  |  |
| 14 |  | s Auomey   |  |
| 15 | 15 Dated: November 29, 2017  | /s/  |  |
| 16 | 16 RANDALI   | LEONARD ited States Attorney   |  |
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## (PROPOSED) ORDER

For the foregoing reasons, the Court HEREBY ORDERS that the date for status in this matter is re-set for January 23, 2017, at 2:00 p.m. before The Honorable William Alsup, and that the time from the date of this Order through the date of the status conference on January 23, 2017, shall be excluded from any calculations under 18 U.S.C. § 3161 and Rule 5.1 of the Federal Rules of Criminal Procedure.

IT IS SO ORDERED.

Dated: December 3, 2017.

HON. WILLIAM ALSUP

United States District Judge